

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GLANDER INTERNATIONAL BUNKERING INC.,	: 21 CIV 6830 (WFK)(TAM)
Plaintiff,	: ECF CASE
- against -	:
M/V TERESA (IMO 9175016), <i>in rem</i>	:
Defendant.	:
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E.N. BISSO & SON, INC.,	:
Intervening Plaintiff,	:
M/V TERESA (IMO 9175016), <i>in rem</i> , BARGE ACADIA (O.N. 1049252), <i>in rem</i> , and UNICO MARINE SERVICES LLC, <i>in personam</i> ,	:
Defendants.	:
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JMB SHIPPING ATB 284, LLC, JMB SHIPPING, ATB 220, LLC, and JMB SHIPPING ATB 205, LLC	:
Intervening Plaintiffs,	:
UNICO MARINE SERVICES LLC, <i>in personam</i> ,	:
Defendants.	:
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**NOTICE OF MOTION FOR THE INTERLOCUTORY
PRIVATE SALE OF THE M/V TERESA AND BARGE ACADIA, *IN REM***

PLEASE TAKE NOTICE that upon the accompanying Memorandum in Support, the Declaration of Riccardo Valentini dated January 13, 2022, the exhibits annexed thereto, any reply papers served hereafter, and all pleadings and prior proceedings had herein, Defendant Unico Marine Services LLC (“Unico Marine” or “Defendant”), will move this Court, before the Honorable William F. Kuntz, at the U.S. Courthouse for the Eastern District of New York, 225

Cadman Plaza East, Brooklyn, NY 11201, pursuant to Rule E(5)(c) and Rule E(9) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions and Local Admiralty Rule E.4 for an Order:

1. ordering the interlocutory private sale of the M/V TERESA and Barge ACADIA to a third-party purchaser for the price of Three Million Three Hundred and Fifty Thousand Dollars (\$3,350,000), consistent with the terms of a December 3, 2021 Memorandum of Agreement;
2. ordering that the sale proceeds from such interlocutory private sale be deposited into the Registry of the Court pursuant to Local Rule 67.1 within ten (10) business days of the Order;
3. ordering that, upon confirmation by the Clerk and the U.S. Marshal that the purchase price has been deposited, the M/V TERESA and Barge ACADIA will be the property of the third-party purchaser, free and clear of all liens, encumbrances, and/or claims;
4. ordering the payment of sale commissions to the sale and purchase brokers; and
5. granting such other and further relief as the Court may deem just and proper under the circumstances.

Dated: New York, New York
January 14, 2022

The Defendant
UNICO MARINE SERVICES LLC

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2022, a copy of the foregoing was filed electronically on the Court's CM/ECF docketing system. Notice of this filing will be sent by e-mail to all parties and all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.



Patrick F. Lennon